

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN

BRITANY HOWARD,  
  
Plaintiff,

Case No.  
  
Hon.

v.

Hon.  
Magistrate Judge

MAYCO INTERNATIONAL., a Michigan corporation,  
and CLAUDIUS SLORESTAL, an individual,

Defendants.

\_\_\_\_\_/

MARK E. SISSON (P75250)  
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There is no other civil action between these parties arising out of the same transaction or occurrence as alleged in this Complaint pending in this Court, nor has any such action been previously filed and dismissed or transferred after having been assigned to a judge, nor do I know of any other civil action not between these parties, arising out of the same transaction or occurrence as alleged in this Complaint that is either pending or was previously filed and dismissed, transferred, or otherwise disposed of after having been assigned to a judge in this Court.



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## **COMPLAINT AND JURY DEMAND**

Plaintiff Britany Howard, by and through her attorneys, The Mark Sisson Law Firm, PLLC, by Mark E. Sisson hereby complains against Defendants Mayco International and Claudius Slorestal, and in support thereof states:

1. Plaintiff Britany Howard (“Howard” or “Plaintiff”) is a resident of the City of Livonia, County of Wayne, Michigan.
2. Defendant Mayco International (“Mayco”) is a Michigan corporation that has its principal place of business located in the State of Michigan.
3. Defendant Claudius Slorestal (“Slorestal,” collectively “Defendants”) is a resident of the State of Michigan and was employed in Michigan.
4. The events giving rise to this action occurred in the Eastern District of Michigan.
5. Jurisdiction is vested with this Court pursuant to 42 USC § 2000e, et. seq. and 28 USC § 1331.
6. Jurisdiction is vested with this Court for the state law claims pursuant to 28 USC § 1367.
7. On or about May 10, 2022, the Equal Employment Opportunity Commission (EEOC) issued a Dismissal and Notice of Rights letter to Plaintiff.

## **GENERAL ALLEGATIONS**

8. Howard was employed with Mayco as an operator.
9. Slorestal is/was employed with MAYCO as a manager for MAYCO.



10. Slorestal was assigned as Howard's direct supervisor.
11. During Howard's employment, Slorestal made repeated and unwanted sexual advances, contact and comments toward Howard.
12. In or around October of 2021, Howard was subjected to unwelcomed touching and sexual harassment at work by Slorestal.
13. In October of 2021, Slorestal approached Howard to start the equipment that Howard was going to be working on.
14. Slorestal cornered Howard and tried to kiss her.
15. Howard tried to push Slorestal off when he turned his back to her so his back was flat against her chest.
16. Slorestal reached his hand behind him and groped Howard's genitals.
17. Slorestal repeatedly harassed Howard during the month she was employed at Mayco.
18. Slorestal sent Howard text messages asking her to hang out with him.
19. These comments and behavior were unwelcome and offensive.
20. Howard contacted her temp service who contacted human resources at Mayco.
21. Human resources contacted Howard and informed her that they would be starting an investigation.
22. Howard told human resources that she was willing to continue working, but not with Slorestal.



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23. Howard did not return to work following the incident.

24. Slorestal is still employed by Mayco and human resources has done nothing regarding an investigation.

## **COUNT I**

### **VIOLATION OF TITLE VII - SEXUAL HARASSMENT** **(against Defendant MAYCO)**

25. Howard hereby incorporates by reference all previous paragraphs of this Complaint as if fully set forth herein.

26. At all material times, Howard was an employee, and MAYCO was her employer, covered by and within the meaning of 42 USC § 2000e et. seq.

27. Howard was sexually harassed by MAYCO's agents and employees throughout the course of her employment.

28. The sexual harassment included, but is not limited to, unwelcome comments and conduct of an offensive and sexual nature directed at Howard and the creation of a hostile work environment.

29. Howard complained about harassment, discrimination, and the events described above to MAYCO's Managers.

30. MAYCO did not promptly remedy ongoing sexual harassment when Plaintiff complained.

31. MAYCO permitted sexual harassment to continue.



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32. The conducts of MAYCO's agents and employees in sexually harassing Howard constitutes sexual discrimination in violation of 42 USC § 2000e et. seq.

33. As a result of the foregoing, Howard has suffered damages, including but not limited to: lost past and future wages, loss of earning capacity and severe emotional distress.

**COUNT II**  
**VIOLATION OF ELLIOT LARSEN ACT MCL 37.2101 et. seq.**  
**SEXUAL HARASSMENT**  
**(against both Defendants)**

34. Howard hereby incorporates by reference all previous paragraphs of this Complaint as if fully set forth herein.

35. At all material times, Howard was an employee, and Defendants were her employer, covered by and within the meaning of the Michigan Elliot-Larsen Civil Rights Act, MCL 37.2101 et. seq.

36. Howard was sexually harassed by Defendants throughout the course of her employment.

37. This sexual harassment has included, but is not limited to, unwelcome comments and conduct of an offensive and sexual nature directed at Howard and the creation of a hostile work environment.

38. The actions of Defendants were intentional.

39. The conduct of Slorestal in sexually harassing Howard constitutes sexual discrimination in violation of MCL 37.2101 et. seq.



40. As a direct and proximate result of Defendants' unlawful actions against Howard as described, Howard has suffered injuries and damages, including, but not limited to, potential loss of earnings and earning capacity; loss of career opportunities; loss of reputation and esteem in the community; mental and emotional distress; loss of the ordinary pleasures of life; and other injuries, damages, and consequences that are found to be related to the Defendants' acts that develop during the course of discovery and trial

**COUNT III**  
**BATTERY**  
**(against Defendant Claudius Slorestal)**

41. Plaintiff hereby incorporates by reference all previous paragraphs of this Complaint as if fully set forth herein.

42. Slorestal intended to cause and did cause harmful or offensive contact with Howard's person when he groped her genitals.

43. Howard did not consent to Slorestal's harmful or offensive contact.

44. As a result of the foregoing, Howard has suffered damages as fully set forth in the paragraphs of this Complaint.

**COUNT IV**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
**(against Defendant Claudius Slorestal)**

45. Howard hereby incorporates by reference all previous paragraphs of this Complaint as if fully set forth herein.

46. Slorestal's conduct as outlined above was extreme and outrageous.



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47. Slorestal intended to cause Howard emotional distress, or Slorestal acted with reckless disregard of the probability that Howard would suffer emotional distress.

48. Slorestal's conduct caused Howard to suffer severe emotional distress.

49. Howard suffered severe emotional distress including suffering anguish, fright, horror, nervousness, grief, anxiety, worry, shock, humiliation, and shame.

50. Slorestal's conduct was a substantial factor in causing Howard's severe emotional distress.

51. As a result of the foregoing, Howard has suffered damages as fully set forth in this Complaint.

WHEREFORE, Plaintiff, Brittany Howard, prays that this Honorable Court enter judgment in her favor against Defendants, MAYCO and Claudius Slorestal, in an amount in that this Court deems fair and just, plus costs, interest, and attorney fees.

### **JURY DEMAND**

Plaintiff Brittany Howard hereby demands a trial by jury.



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Respectfully submitted,  
THE MARK SISSON LAW FIRM, PLLC

/s/ **Mark E. Sisson**

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Date: May 31, 2022



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